



CITIZENS FOR A HEALTHY BAY

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May 19, 2006

Municipal Stormwater Phase I Comments

Ann Wessel

WA Department of Ecology

Water Quality Program

P.O. Box 47696

Olympia, WA 98504-7600

Dear Ann:

Thank you for the opportunity to submit comments on the Draft Phase I Municipal Stormwater NPDES and State Waste Discharge General Permit. These comments are submitted on the behalf of Citizens for a Healthy Bay, a nonprofit environmental organization with more than 1,000 volunteers and member supporters in Tacoma and the surrounding community.

The current draft permit does not adequately address the threat to water quality from the multitude of pollutants flowing from impervious surfaces into our streams, wetlands and Puget Sound. The purpose of this comment letter is to request that Low Impact Development (LID) code language in the permit be strengthened and that the permit require a regulatory pathway for LID in all stormwater management plans.

These techniques are well known to offer more volume reduction than traditional methods and increased metal and nutrient removal, in many cases with a lower financial burden to the jurisdiction.

While Low impact Development (LID) is addressed in the draft permit (Condition S5.C.5.b.iii.), we feel that the language is not strong enough. Current language states that jurisdictions must "allow" approaches such as Low Impact Development Techniques. There needs to be language stating that jurisdictions shall incorporate LID guidelines and regulations into their stormwater management program for new development as well as for source control in existing developed areas. Under current stormwater guidelines and regulations, Low Impact Development techniques are restricted and the process for using these "alternative techniques" costly and time-consuming. Furthermore we would like to see the "Low Impact Development Technical Guidance Manual for Puget Sound" used to implement changes in new developments and create innovative changes in urban and developed areas to reduce stormwater runoff.

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We need to take bold measures not only to protect the twenty-year, multi-million dollar investment to remediate the historical Superfund area in Commencement Bay, but also to guarantee the aquatic health of Western Washington's waters. The technology afforded by Low Impact Development has demonstrated the ability to achieve reduced flows and reduced concentration of metals and nutrients which we believe to be essential for protecting water quality.

Thank you for your consideration of our remarks.

Sincerely,

Michael Montgomery
Commencement Baykeeper, Citizens for a Healthy Bay